## Lee v. The Moody Bible Institute of Chicago Assumptions

Trial Date	October 25, 2021
Decedent: Joochan Lee	
•	_
Date of Death	July 13, 2018
Age at Death	24.6 years
Life Expectancy	53.1 years
Worklife Expectancy as of July 1, 2020, as a College Graduate	36.9 years
Decedent's Spouse: Yuki Lee	
•	
• Age as of July 13, 2018	26.3 years
Life Expectancy	55.8 years
Decedent's Daughter: AL	
•	
Personal Consumption	23% to 31%
Wage Growth Rate - Private Sector	
- Past	2.97%
- Future	3.34%
Household Services Growth Rate - Services Sector	
- Past	3.90%
- Future	3.86%
Discount Rate	1.91%

### Lee v. The Moody Bible Institute of Chicago **Summary of Damages** Scenario 1 - Based on Employment as a Pilot

Assuming Retirement at Age 67		Total Value	Present Value
Loss of Support [1]		value	value
Past	\$	74,096	\$ 74,096
Future	Ψ	8,810,961	5,633,530
Loss of Employer Contributions to Fringe Benefits [2]		0,010,301	3,000,000
Past		8,672	8,672
Future		534,940	349,658
Loss of Support from Employer Contributions to Retirement and Savings [3]			
Past		2,974	2,974
Future		378,870	242,244
Loss of Household Services [4]			
Past		36,453	36,453
Future		935,463	535,427
Total Loss	\$	10,782,429	\$ 6,883,054
Past	\$	122,195	\$ 122,195
Future		10,660,234	6,760,859
Total	\$	10,782,429	\$ 6,883,054

### Sources and Notes:

Note: Scenario 1 will be supplemented pending review of information from aviation consultant Kit Dirby.

<sup>[1]</sup> See Schedule 2.

<sup>[2]</sup> See Schedule 5.

<sup>[3]</sup> See Schedule 7.

<sup>[4]</sup> See Schedule 15.

### Lee v. The Moody Bible Institute of Chicago **Summary of Damages** Scenario 2 - Based on Earnings with a Bachelor's Degree

Assuming Retirement at Age 67	Total Value	Present Value
Loss of Support [1]		
Past	\$ 89,614	\$ 89,614
Future	5,919,230	3,936,512
Loss of Employer Contributions to Health Benefits [2]		
Past	9,875	9,875
Future	609,343	398,283
Loss of Support from Employer Contributions to Retirement and Savings [3]		
Past	3,218	3,218
Future	225,516	149,988
Loss of Household Services [4]		
Past	36,453	36,453
Future	935,463	535,427
Total Loss	\$ 7,828,712	\$ 5,159,370
Past	\$ 139,160	\$ 139,160
Future	7,689,552	5,020,210
Total	\$ 7,828,712	\$ 5,159,370

<sup>[1]</sup> See Schedule 9.

<sup>[2]</sup> See Schedule 11.

<sup>[3]</sup> See Schedule 13.

<sup>[4]</sup> See Schedule 15.

												Cumulative Totals				
	Decedent's											Present	_			Present
	Age at				D	ecedent's						Value of				Value of
Period	Beginning		Loss of			Personal			Loss of			Loss of		Loss of		Loss of
Beginning	of Period		Earnings	[1]		nsumption	[2]		Support	[3]		Support	[4]	Support		Support
·																
13-Jul-18	24.6	\$	1,483		\$	341		\$	1,142		\$	1,142		\$ 1,142	\$	1,142
1-Jan-19	25.1		3,241			745			2,496			2,496		3,638		3,638
1-Jan-20	26.1		1,664			383			1,281			1,281		4,919		4,919
1-Jul-20 1-Jan-21	26.6 27.1		33,443			7,692			25,751			25,751	Г	30,670 74,096		30,670 74,096
1-Jan-21		•	56,398		•	12,972		_	43,426		•	43,426	_ L	74,090	<u> </u>	74,090
	Subtotal, past:	\$	96,229		\$	22,133		\$	74,096	-	\$	74,096	_			
25-Oct-21	27.9	\$	12,912		\$	2,970		\$	9,942		\$	9,923		\$ 9,942	\$	9,923
1-Jan-22	28.1		71,625			16,474			55,151			54,425		65,093		64,348
1-Jan-23	29.1		36,704			8,442			28,262			27,628		93,355		91,976
1-Jul-23	29.6		51,905			11,938			39,967			38,702		133,322		130,678
1-Jan-24	30.1		106,403			24,473			81,930			77,850		215,252		208,528
1-Jan-25	31.1		109,957			25,290			84,667			78,943		299,919		287,471
1-Jan-26	32.1		113,630			26,135			87,495			80,051		387,414		367,522
1-Jan-27	33.1		117,425			27,008			90,417			81,174		477,831		448,696
1-Jan-28	34.1		121,347			27,910			93,437			82,313		571,268		531,009
1-Jan-29	35.1		125,400			28,842			96,558			83,468		667,826		614,477
1-Jan-30	36.1		64,262			14,780			49,482			42,371		717,308		656,848
1-Jul-30	36.6		74,590			17,156			57,434			48,717		774,742		705,565
1-Jan-31	37.1		152,906			35,168			117,738			97,997		892,480		803,562
1-Jan-32	38.1		158,013			36,343			121,670			99,372		1,014,150		902,934
1-Jan-33	39.1		80,974			18,624			62,350			50,444		1,076,500		953,378
1-Jul-33	39.6		124,382			28,608			95,774			76,756		1,172,274		1,030,134
1-Jan-34	40.1		254,978			58,645			196,333			154,397		1,368,607		1,184,531
1-Jan-35	41.1		263,494			60,604			202,890			156,563		1,571,497		1,341,094
1-Jan-36	42.1		272,295			62,628			209,667			158,761		1,781,164		1,499,855
1-Jan-37	43.1		281,390			64,720			216,670			160,989		1,997,834		1,660,844
1-Jan-38	44.1		290,788			66,881			223,907			163,248		2,221,741		1,824,092
1-Jan-39	45.1		300,500			69,115			231,385			165,538		2,453,126		1,989,630
1-Jan-40	46.1		310,537			71,424			239,113			167,861		2,692,239		2,157,491
1-Jan-41	47.1		36,927			8,493			28,434			19,923		2,720,673		2,177,414
12-Feb-41	47.2		283,982			88,034			195,948			134,980		2,916,621		2,312,394
1-Jan-42	48.1		331,627			102,804			228,823			154,672		3,145,444		2,467,066
1-Jan-43	49.1		342,703			106,238			236,465			156,842		3,381,909		2,623,908
1-Jan-44	50.1		354,149			109,786			244,363			159,043		3,626,272		2,782,951
1-Jan-45	51.1		365,978			113,453			252,525			161,275		3,878,797		2,944,226
1-Jan-46	52.1		378,202			117,243			260,959			163,537		4,139,756		3,107,763
1-Jan-47	53.1		390,834			121,159			269,675			165,832		4,409,431		3,273,595
1-Jan-48	54.1		403,888			125,205			278,683			168,160		4,688,114		3,441,755
1-Jan-49	55.1		417,378			129,387			287,991			170,519		4,976,105		3,612,274
1-Jan-50	56.1		431,318			133,709			297,609			172,911		5,273,714		3,785,185
1-Jan-51	57.1		445,724			138,174			307,550			175,338		5,581,264		3,960,523
1-Jan-52	58.1		460,611			142,789			317,822			177,799		5,899,086		4,138,322
1-Jan-53	59.1		475,995			147,558			328,437			180,293		6,227,523		4,318,615
1-Jan-54	60.1		491,893			152,487			339,406			182,823		6,566,929		4,501,438
1-Jan-55	61.1		508,322			157,580			350,742			185,388		6,917,671		4,686,826
1-Jan-56	62.1		525,300			162,843			362,457			187,989		7,280,128		4,874,815
1-Jan-57	63.1		193,513			59,989			133,524			68,861		7,413,652		4,943,676
11-May-57	<sup>[5]</sup> 63.5		349,332			108,293			241,039			122,673		7,654,691		5,066,349
1-Jan-58	64.1		560,976			173,903			387,073			193,302		8,041,764		5,259,651
1-Jan-59	65.1		579,713			179,711			400,002			196,015		8,441,766	_	5,455,666
1-Jan-60	66.1		535,065			165,870			369,195			177,864	Ĺ	8,810,961	╵╙	5,633,530
22-Nov-60 <sup>1</sup>													_			
	Subtotal, future:	\$	12,359,847		\$	3,548,886		\$	8,810,961		\$	5,633,530	_			
Total,	past and future:	\$	12,456,076		\$	3,571,019		\$	8,885,057	- :	\$	5,707,626	=			

<sup>[1]</sup> See Schedule 3.

 $<sup>^{[2]}</sup>$  Based on a personal consumption rate of 23.0% when there is one child in the home to age 22, and 31.0% thereafter.

 $<sup>^{\</sup>mbox{\scriptsize [3]}}$  Loss of support equals loss of earnings less personal consumption of the decedent.

<sup>[4]</sup> Discounted to present value using a discount rate of 1.91% based on the current yield on long term treasury bonds.

<sup>[5]</sup> Decedent's worklife expectancy ends.

<sup>[6]</sup> Assuming retirement at age 67.

### Lee v. The Moody Bible Institute of Chicago But-For Annual Earnings Scenario 1 - Based on Employment as a Pilot

						Annual
			Earnings			
			<b>But-For</b>	<b>Earnings</b>		Adjusted
Period			Annual	Base	<b>Earnings</b>	to Period
Beginning	Years	Occupation	Earnings	Year	Percentile	Beginning
13-Jul-18	2.0	College student/part time janitor	\$ 3,147	2018	NA	\$ 3,147 <sup>[1]</sup>
1-Jul-20	3.0	Commercial pilot	67,070	2020	25th	67,070 <sup>[2]</sup>
1-Jul-23	7.0	Commercial pilot	93,300	2020	50th	102,964 <sup>[2]</sup>
1-Jul-30	3.0	Airline pilot	106,530	2020	25th	147,964 <sup>[2]</sup>
1-Jul-33	27 4	Airline pilot	160 970	2020	50th	246.737 <sup>[2]</sup>

<sup>&</sup>lt;sup>[1]</sup> Based on the decedent's earnings as a part-time janitor at Moody Bible Institute of Chicago. Earnings for 2018 are adjusted to reflect a full year. See Schedule 4.

It is our understanding that Mr. Lee's accident occurred while taking his first flight training lesson, and that he planned to become a pilot. He was in a Bachelor's degree program at Moody Bible Institute, and would have completed his pilot training as well as his Bachelor's degree by July 2020. We have assumed that he would have found a position as a commercial pilot. According to information from the Bureau of Labor Statistics, commercial pilots "are involved in unscheduled flight activities, such as aerial application, charter flights, and aerial tours." Commercial pilots must have a commercial pilot's license, and usually a high school diploma, along with flight training provided by FAA-certified flight instructors or flight schools. After 10 years of experience as a commercial pilot, we have assumed Mr. Lee would have met required flight hours and other requirements to become an airline pilot. According to the Bureau of Labor Statistics, airline pilots "transport passengers and cargo on a fixed schedule", and typically need a Bachelor's degree, as well as a commercial pilot's license and an FAA issued Airline Transport Pilot certificate. For both the commercial pilot job and the airline pilot job, we have assumed three years at the 25th percentile earnings level, and then proceeding to 50th percentile earnings. The 2020 earnings data above was obtained from the Bureau of Labor Statistics. We have adjusted 2020 earnings to each period beginning date using the historical private sector wage growth rate of 3.34% per year.

## Lee v. The Moody Bible Institute of Chicago Historical Annual Earnings of the Decedent

Year	Annual Earnings	Employer
2017 2018	\$ 2,636 1.664	Moody Bible Institute of Chicago Moody Bible Institute of Chicago

Obtained from W-2 forms. The decedent was employed part-time as a janitor. We note that the decedent had received scholarships or grants of \$7,800 in 2017 and \$8,400 in 2018 from Moody Bible Institute according to 1098-T forms.

### Lee v. The Moody Bible Institute of Chicago Loss of Employer Contributions to Fringe Benefits Scenario 1 - Based on Employment as a Pilot

								Cumulative Totals					
		Present								Present			
	Decedent's					Value of					Value of		
	Age at		Loss of			Loss of		L	oss of		Loss of		
Period	Beginning		Fringe			Fringe			Fringe		Fringe		
Beginning	of Period		Benefits	[1]		Benefits	[2]		enefits		Benefits		
13-Jul-18	24.6	\$	-		\$	-		\$	-	\$	-		
1-Jan-19	25.1		-			-			-		-		
1-Jan-20	26.1		-			-			-		-		
1-Jul-20	26.6		3,250			3,250			3,250		3,250		
1-Jan-21	27.1		5,422	_		5,422			8,672		8,672		
	Subtotal, past:	\$	8,672		\$	8,672	_						
25-Oct-21	27.9	\$	1,241		\$	1,239		\$	1,241	\$	1,239		
1-Jan-22	28.1		6,886			6,795			8,127		8,034		
1-Jan-23	29.1		7,116			6,891			15,243		14,925		
1-Jan-24	30.1		7,354			6,988			22,597		21,913		
1-Jan-25	31.1		7,600			7,086			30,197		28,999		
1-Jan-26	32.1		7,854			7,186			38,051		36,185		
1-Jan-27	33.1		8,116			7,286			46,167		43,471		
1-Jan-28	34.1		8,387			7,388			54,554		50,859		
1-Jan-29	35.1		8,667			7,492			63,221		58,351		
1-Jan-30	36.1		8,956			7,597			72,177		65,948		
1-Jan-31	37.1		9,255			7,703			81,432		73,651		
1-Jan-32	38.1		9,564			7,811			90,996		81,462		
1-Jan-33	39.1		9,883			7,920			100,879		89,382		
1-Jan-34	40.1		10,213			8,032			111,092		97,414		
1-Jan-35	41.1		10,554			8,144			121,646		105,558		
1-Jan-36	42.1		10,907			8,259			132,553		113,817		
1-Jan-37	43.1		11,271			8,374			143,824		122,191		
1-Jan-38	44.1		11,647			8,492			155,471		130,683		
1-Jan-39	45.1		12,036			8,611			167,507		139,294		
1-Jan-40	46.1		12,438			8,732			179,945		148,026		
1-Jan-41	47.1		12,853			8,854			192,798		156,880		
1-Jan-42	48.1		13,282			8,978			206,080		165,858		
1-Jan-43	49.1		13,726			9,104			219,806		174,962		
1-Jan-44	50.1		14,184			9,232			233,990		184,194		
1-Jan-45	51.1		14,658			9,361			248,648		193,555		
1-Jan-46	52.1		15,148			9,493			263,796		203,048		
1-Jan-47	53.1		15,654			9,626			279,450		212,674		
1-Jan-48	54.1		16,177			9,761			295,627		222,435		
1-Jan-49	55.1		16,717			9,898			312,344		232,333		
1-Jan-50	56.1		17,275			10,037			329,619		242,370		
1-Jan-51	57.1		17,852			10,178			347,471		252,548		
1-Jan-52	58.1		18,448			10,320			365,919		262,868		
1-Jan-53	59.1		19,064			10,465			384,983		273,333		
1-Jan-54	60.1		19,701			10,612			404,684		283,945		
1-Jan-55	61.1		20,359			10,761			425,043		294,706		
1-Jan-56	62.1		21,039			10,912			446,082		305,618		
1-Jan-57	63.1		7,750			3,997			453,832		309,615		
11-May-57 <sup>[3</sup>			13,992			7,121			467,824		316,736		
1-Jan-58	64.1		22,468			11,220			490,292		327,956		
1-Jan-59	65.1		23,218			11,378		_	513,510	_	339,334		
1-Jan-60	66.1		21,430			10,324			534,940	<u> </u>	349,658		
22-Nov-60 <sup>[4</sup>		_	E24 040		•	240.050	_						
	Subtotal, future: past and future:	<u>\$</u>	534,940 543,612		\$	349,658 358,330	-						
· otal,			J .J,J .Z		Ψ	230,000							

<sup>&</sup>lt;sup>[1]</sup> See Schedule 6. Note: We have not apportioned the contributions to reflect coverage for the decedent's spouse and child only.

 $<sup>^{[2]}</sup>$  Discounted to present value using a discount rate of 1.91% based on the current yield on long term treasury bonds.

 $<sup>^{\</sup>left[ 3\right] }$  Decedent's worklife expectancy ends.

<sup>[4]</sup> Assuming retirement at age 67.

Schedule 6

Lee v. The Moody Bible Institute of Chicago But-For Employer Contributions to Fringe Benefits Scenario 1 - Based on Employment as a Pilot

Annual Employer										
	Contributions									
Period Beginning		Fringe enefits <sup>[1]</sup>								
1lul-20	\$	6 448								

<sup>[1]</sup> Based on the Bureau of Labor Statistics study, Employer Costs for Employee Compensation, as of June 2020 the employer cost for health and disability benefits was \$3.10 per hour for fulltime employees in the services sector - trade, transportation and utilities.

# Lee v. The Moody Bible Institute of Chicago Loss of Support from Employer Contributions to Retirement and Savings Scenario 1 - Based on Employment as a Pilot

	Scenario			p	. ,			Cumulative Totals					
Period Beginning	Decedent's Age at Beginning of Period	En	oss of nployer ributions <sup>[1]</sup>	yer Personal			oss of port from nployer ributions <sup>[3]</sup>	Va Lo Supp Em	resent alue of coss of cort from aployer ributions [4]	Loss of Support from Employer Contributions		Present Value of Loss of Support from Employer Contributions	
13-Jul-18	24.6	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-
1-Jan-19	25.1		-		-		-		-		-		-
1-Jan-20	26.1		-		-		-		-		-		-
1-Jul-20	26.6		1,438		331		1,107		1,107		1,107		1,107
1-Jan-21	27.1		2,425		558		1,867		1,867		2,974		2,974
s	ubtotal, past:	\$	3,863	\$	889	\$	2,974	\$	2,974				
25-Oct-21	27.9		555	\$	128	\$	427	\$	426	\$	427	\$	426
1-Jan-22	28.1		3,080	Ψ	708	Ψ	2,372	Ψ	2,341	Ψ	2,799	Ψ	2,767
1-Jan-23	29.1		1,578		363		1,215		1,188		4,014		3,955
1-Jul-23	29.6		2,232		513		1,719		1,665		5,733		5,620
1-Jan-24	30.1		4,575		1,052		3,523		3,348		9,256		8,968
1-Jan-25	31.1		4,728		1,087		3,641		3,395		12,897		12,363
1-Jan-26	32.1		4,886		1,124		3,762		3,442		16,659		15,805
1-Jan-27	33.1		5,049		1,161		3,888		3,491		20,547		19,296
1-Jan-28	34.1		5,218		1,200		4,018		3,540		24,565		22,836
1-Jan-29	35.1		5,392		1,240		4,152		3,589		28,717		26,425
1-Jan-30	36.1		2,763		635		2,128		1,822		30,845		28,247
1-Jul-30	36.6		3,207		738		2,469		2,094		33,314		30,341
1-Jan-31	37.1		6,575		1,512		5,063		4,214		38,377		34,555
1-Jan-32	38.1		6,795		1,563		5,232		4,273		43,609		38,828
1-Jan-33	39.1		3,482		801		2,681		2,169		46,290		40,997
1-Jul-33	39.6		5,348		1,230		4,118		3,300		50,408		44,297
1-Jan-34	40.1		10,964		2,522		8,442		6,639		58,850		50,936
1-Jan-35	41.1		11,330		2,606		8,724		6,732		67,574		57,668
1-Jan-36	42.1		11,709		2,693		9,016		6,827		76,590		64,495
1-Jan-37	43.1		12,100		2,783		9,317		6,923		85,907		71,418
1-Jan-38	44.1		12,504		2,876		9,628		7,020		95,535		78,438
1-Jan-39	45.1		12,922		2,972		9,950		7,118		105,485		85,556
1-Jan-40	46.1		13,353		3,071		10,282		7,218		115,767		92,774
1-Jan-41	47.1		1,588		365		1,223		857		116,990		93,631
12-Feb-41 [5]	47.2		12,211		3,785		8,426		5,804		125,416		99,435
1-Jan-42	48.1		14,260		4,421		9,839		6,651		135,255		106,086
1-Jan-43	49.1		14,736		4,568		10,168		6,744		145,423		112,830
1-Jan-44	50.1		15,228		4,721		10,507		6,838		155,930		119,668
1-Jan-45	51.1		15,737		4,878		10,859		6,935		166,789		126,603
1-Jan-46	52.1		16,263		5,042		11,221		7,032		178,010		133,635
1-Jan-47	53.1		16,806		5,210		11,596		7,131		189,606		140,766
1-Jan-48	54.1		17,367		5,384		11,983		7,231		201,589		147,997
1-Jan-49	55.1		17,947		5,564		12,383		7,332		213,972		155,329
1-Jan-50	56.1		18,547		5,750		12,797		7,435		226,769		162,764
1-Jan-51	57.1		19,166		5,941		13,225		7,540		239,994		170,304
1-Jan-52	58.1		19,806		6,140		13,666		7,645		253,660		177,949
1-Jan-53	59.1		20,468		6,345		14,123		7,753		267,783		185,702
1-Jan-54	60.1		21,151		6,557		14,594		7,861		282,377		193,563
1-Jan-55	61.1		21,858		6,776		15,082		7,972		297,459		201,535
1-Jan-56	62.1		22,588		7,002		15,586		8,084		313,045		209,619
1-Jan-57	63.1		8,321		2,580		5,741		2,961		318,786		212,580
11-May-57 <sup>[6]</sup>	63.5		15,021		4,657		10,364		5,275		329,150		217,855
1-Jan-58	64.1		24,122		7,478		16,644		8,312		345,794		226,167
1-Jan-59	65.1		24,928		7,728		17,200		8,429		362,994		234,596
1-Jan-60	66.1		23,008		7,132		15,876		7,648		378,870		242,244
22-Nov-60 [7]	67.0												
Sul	btotal, future:	\$	531,472	\$	152,602	\$	378,870	\$	242,244				
Total, pas	st and future:	\$	535,335	\$	153,491	\$	381,844	\$	245,218				

<sup>[1]</sup> See Schedules 2 and 8.

 $<sup>^{[2]}</sup>$  Based on a personal consumption rate of 23% when there is one child in the home (to age 22), and 31.0% thereafter.

<sup>[3]</sup> Loss of support equals loss of earnings less personal consumption of the decedent.

<sup>[4]</sup> Discounted to present value using a discount rate of 1.91% based on the current yield on long term treasury bonds.

<sup>&</sup>lt;sup>[5]</sup> Daughter AL reaches age 22.

<sup>[6]</sup> Decedent's worklife expectancy ends.

<sup>[7]</sup> Assuming retirement at age 67.

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Schedule 8

Lee v. The Moody Bible Institute of Chicago
But-For Employer Contributions to Pension Savings Plan
Scenario 1 - Based on Employment as a Pilot

	Employer Contributions to
Period Beginning	Retirement and Savings [1]
1-Jul-20	4.30%

<sup>&</sup>lt;sup>[1]</sup> Based on the Bureau of Labor Statistics study, Employer Costs for Employee Compensation, as of June 2020 the employer cost for retirement and savings was 4.3% of earnings for fulltime employees in the services sector - trade, transportation and utilities.

### Lee v. The Moody Bible Institute of Chicago **Loss of Support** Scenario 2 - Based on Earnings with a Bachelor's Degree

													_	Cumulat	ive T	otals
	Decedent's				_							Present				Present
Dania d	Age at					edent's						/alue of				Value of
Period	Beginning		Loss of	[1]		ersonal sumption	[2]		Loss of	[3]		Loss of	[4]	Loss of		Loss of
Beginning	of Period		arnings		Cons	sumption			Support			Support		Support	-	Support
13-Jul-18	24.6	\$	1,483		\$	341		\$	1,142		\$	1,142		\$ 1,142	\$	1,142
1-Jan-19	25.1	Ψ	3,241		Ψ	745		Ψ	2,496		Ψ	2,496		3,638	Ψ	3,638
1-Jan-20	26.1		1,664			383			1,281			1,281		4,919		4,919
1-Jul-20	26.6		40,945			9,417			31,528			31,528		36,447		36,447
1-Jan-21	27.1		69,048			15,881			53,167			53,167	F	89,614	Г	89,614
	Subtotal, past:	\$	116,381		\$	26,767		\$	89,614	_	\$	89,614	- L	55,511	_	55,511
	Cubiciai, paci		,		<u> </u>	0,. 0.		<u> </u>	00,011	-		00,011	-			
25-Oct-21	27.9	\$	15,809		\$	3,636		\$	12,173		\$	12,150		\$ 12,173	\$	12,150
1-Jan-22	28.1		87,691			20,169			67,522			66,634		79,695		78,784
1-Jan-23	29.1		90,620			20,843			69,777			67,568		149,472		146,352
1-Jan-24	30.1		93,647			21,539			72,108			68,517		221,580		214,869
1-Jan-25	31.1		96,775			22,258			74,517			69,479		296,097		284,348
1-Jan-26	32.1		100,007			23,002			77,005			70,453		373,102		354,801
1-Jan-27	33.1		103,347			23,770			79,577			71,442		452,679		426,243
1-Jan-28	34.1		95,387			21,939			73,448			64,826		526,127		491,069
22-Nov-28	35.0		16,659			3,832			12,827			11,300		538,954		502,369
1-Jan-29	35.1		157,091			36,131			120,960			104,562		659,914		606,931
1-Jan-30	36.1		162,338			37,338			125,000			106,029		784,914		712,960
1-Jan-31	37.1		167,760			38,585			129,175			107,517		914,089		820,477
1-Jan-32	38.1		173,363			39,873			133,490			109,026		1,047,579		929,503
1-Jan-33	39.1		179,153			41,205			137,948			110,555		1,185,527		1,040,058
1-Jan-34	40.1		185,137			42,582			142,555			112,106		1,328,082		1,152,164
1-Jan-35	41.1		191,321			44,004			147,317			113,680		1,475,399		1,265,844
1-Jan-36	42.1		197,711			45,474			152,237			115,274		1,627,636		1,381,118
1-Jan-37	43.1		204,315			46,992			157,323			116,893		1,784,959		1,498,011
1-Jan-38	44.1		188,001			43,240			144,761			105,743		1,929,720		1,603,754
22-Nov-38	45.0		21,552			4,957			16,595			12,099		1,946,315		1,615,853
1-Jan-39	45.1		203,228			46,742			156,486			111,954		2,102,801		1,727,807
1-Jan-40	46.1		210,016			48,304			161,712			113,524		2,264,513		1,841,331
1-Jan-41	47.1		24,973			5,744			19,229			13,474		2,283,742		1,854,805
12-Feb-41	47.2		192,058			59,538			132,520			91,287		2,416,262		1,946,092
1-Jan-42	48.1		224,280			69,527			154,753			104,605		2,571,015		2,050,697
1-Jan-43 1-Jan-44	49.1 50.1		231,771			71,849 74,249			159,922 165,263			106,073 107,561		2,730,937		2,156,770
1-Jan-45	51.1		239,512 247,512			76,729			170,783			107,301		2,896,200 3,066,983		2,264,331 2,373,401
1-Jan-46	52.1		255,779			79,291			176,788			110,601		3,243,471		2,484,002
1-Jan-47	53.1		264,322			81,940			182,382			112,153		3,425,853		2,596,155
1-Jan-48	54.1		243,964			75,629			168,335			101,767		3,594,188		2,697,922
22-Nov-48	55.0		25,047			7,765			17,282			10,428		3,611,470		2,708,350
1-Jan-49	55.1		236,189			73,219			162,970			96,494		3,774,440		2,804,844
1-Jan-50	56.1		244,078			75,664			168,414			97,849		3,942,854		2,902,693
1-Jan-51	57.1		252,230			78,191			174,039			99,222		4,116,893		3,001,915
1-Jan-52	58.1		260,654			80,803			179,851			100,614		4,296,744		3,102,529
1-Jan-53	59.1		269,360			83,502			185,858			102,025		4,482,602	;	3,204,554
1-Jan-54	60.1		278,357			86,291			192,066			103,457		4,674,668	:	3,308,011
1-Jan-55	61.1		287,654			89,173			198,481			104,909		4,873,149	:	3,412,920
1-Jan-56	62.1		297,262			92,151			205,111			106,381		5,078,260	;	3,519,301
1-Jan-57	63.1		109,507			33,947			75,560			38,968		5,153,820	;	3,558,269
11-May-57	<sup>[5]</sup> 63.5		197,684			61,282			136,402			69,419		5,290,222	;	3,627,688
1-Jan-58	64.1		282,662			87,625			195,037			97,585		5,485,259	:	3,725,273
22-Nov-58	65.0		32,872			10,190			22,682			11,327		5,507,941	;	3,736,600
1-Jan-59	65.1		309,973			96,092			213,881			104,809		5,721,822		3,841,409
1-Jan-60	66.1		286,099			88,691			197,408			95,103		5,919,230		3,936,512
22-Nov-60	<sup>[6]</sup> 67.0			_			_			_			_			
	Subtotal, future:		8,234,727			2,315,497	_		5,919,230			3,936,512	_			
Total, p	past and future:	\$ 8	8,351,108	= :	\$ 2	2,342,264	: =	\$	6,008,844	=	\$	4,026,126	=			

Sources and Notes:
[1] See Schedule 10.

<sup>[2]</sup> Based on a personal consumption rate of 23.0% when there is one child in the home (to age 22), and 31.0% thereafter.

 $<sup>^{\</sup>mbox{\scriptsize [3]}}$  Loss of support equals loss of earnings less personal consumption of the decedent.

 $<sup>^{[4]}</sup>$  Discounted to present value using a discount rate of 1.91% based on the current yield on long term treasury bonds.

<sup>[5]</sup> Decedent's worklife expectancy ends.

<sup>[6]</sup> Assuming retirement at age 67.

# Lee v. The Moody Bible Institute of Chicago But-For Annual Earnings Scenario 2 - Based on Earnings with a Bachelor's Degree

Period Beginning	Years	Occupation/Education	But-For Annual Earnings	Earnings Base Year	Annual Earnings Adjusted to Period Beginning
40 1 1 40			<b>A A A A A</b>	2010	¢ 2147 [1]
13-Jul-18	2.0	College student/part time janitor	\$ 3,147	2018	φ 3,147
1-Jul-20	8.4	Bachelor's degree, ages 26.6-34	79,746	2019	82,114 <sup>[2]</sup>
22-Nov-28	10.0	Bachelor's degree, ages 35-44	117,299	2019	152,014 <sup>[2]</sup>
22-Nov-38	10.0	Bachelor's degree, ages 45-54	109,255	2019	196,660 <sup>[2]</sup>
22-Nov-48	10.0	Bachelor's degree, ages 55-64	91,418	2019	228,555 <sup>[2]</sup>
22-Nov-58	2.0	Bachelor's degree, ages 65-67	86,380	2019	299,955 <sup>[2]</sup>

<sup>&</sup>lt;sup>[1]</sup> Based on the decedent's earnings as a part-time janitor at Moody Bible Institute of Chicago. Earnings for 2018 are adjusted to reflect a full year. See Schedule 4.

<sup>&</sup>lt;sup>[2]</sup> Based on the decedent's but-for earnings with a Bachelor's degree. According to data from the U.S. Census Bureau, Current Population Survey, 2020 Annual Social and Economic Supplement (CPS ASEC), the 2019 average earnings above are for males of Asian descent with Bachelor's degrees, who worked fulltime. We have adjusted the 2019 earnings to each period beginning date, using a past wage growth rate of 2.97% per year, and a future wage growth rate of 3.34% per year, beginning in 2021. These wage growth rates are based on historical private sector wage data from the Bureau of Labor Statistics.

### Lee v. The Moody Bible Institute of Chicago Loss of Employer Contributions to Fringe Benefits Scenario 2 - Based on Earnings with a Bachelor's Degree

								Cumulativ			ve Totals			
	Decedent's					Present					Present			
						Value of					Value of			
	Age at	Loss of				Loss of			oss of		Loss of			
Period	Beginning		Fringe			Fringe	[2]		Fringe		Fringe			
Beginning	of Period		Benefits	[1]		Benefits	,	В	enefits		Benefits			
13-Jul-18	24.6	\$			\$			\$		\$				
1-Jan-19	24.6 25.1	Ф	-		Ф	-		Ф	-	Ф	-			
1-Jan-19	26.1		-			-			-		-			
1-Jan-20 1-Jul-20	26.6		3,701			- 3,701			- 3,701		3,701			
1-Jui-20 1-Jan-21						6,174	ı							
1-Jan-21	27.1	_	6,174		•		- 1		9,875	_	9,875			
	Subtotal, past:	\$	9,875		\$	9,875	-							
25-Oct-21	27.9	\$	1,414		\$	1,411		\$	1,414	\$	1,411			
1-Jan-22	28.1	*	7,841		*	7,738		*	9,255	•	9,149			
1-Jan-23	29.1		8,103			7,847			17,358		16,996			
1-Jan-24	30.1		8,374			7,957			25,732		24,953			
1-Jan-25	31.1		8,654			8,069			34,386		33,022			
1-Jan-26	32.1		8,943			8,182			43,329		41,204			
1-Jan-27	33.1		9,242			8,297			52,571		49,501			
1-Jan-28	34.1		9,551			8,414			62,122		57,915			
1-Jan-29	35.1		9,870			8,532			71,992		66,447			
1-Jan-30	36.1		10,200			8,652			82,192		75,099			
1-Jan-31	37.1		10,541			8,774			92,733		83,873			
1-Jan-32	38.1		10,893			8,897			103,626		92,770			
1-Jan-33	39.1		11,257			9,022			114,883		101,792			
1-Jan-34	40.1		11,633			9,148			126,516		110,940			
1-Jan-35	41.1		12,022			9,277			138,538		120,217			
1-Jan-36	42.1		12,424			9,408			150,962		129,625			
1-Jan-37	43.1		12,839			9,540			163,801		139,165			
1-Jan-38	44.1		13,268			9,674			177,069		148,839			
1-Jan-39	45.1		13,711			9,809			190,780		158,648			
1-Jan-40	46.1		14,169			9,947			204,949		168,595			
1-Jan-41	47.1		14,642			10,086			219,591		178,681			
1-Jan-42	48.1		15,131			10,228			234,722		188,909			
1-Jan-43	49.1		15,636			10,371			250,358		199,280			
1-Jan-44	50.1		16,158			10,516			266,516		209,796			
1-Jan-45	51.1		16,698			10,664			283,214		220,460			
1-Jan-46	52.1		17,256			10,814			300,470		231,274			
1-Jan-47	53.1		17,832			10,965			318,302		242,239			
1-Jan-48	54.1		18,428			11,120			336,730		253,359			
1-Jan-49	55.1		19,043			11,275			355,773		264,634			
1-Jan-50	56.1		19,679			11,434			375,452		276,068			
1-Jan-51	57.1		20,336			11,594			395,788		287,662			
1-Jan-52	58.1		21,015			11,756			416,803		299,418			
1-Jan-53	59.1		21,717			11,921			438,520		311,339			
1-Jan-54	60.1		22,442			12,088			460,962		323,427			
1-Jan-55	61.1		23,192			12,258			484,154		335,685			
1-Jan-56	62.1		23,967			12,431			508,121		348,116			
1-Jan-57	63.1		8,829			4,553			516,950		352,669			
11-May-57 <sup>[5</sup>			15,938			8,111			532,888		360,780			
1-Jan-58	64.1		25,594			12,781			558,482		373,561			
1-Jan-59	65.1		26,449			12,761			584,931		386,522			
1-Jan-60	66.1		24,412			11,761	I		609,343		398,283			
22-Nov-60 <sup>[-</sup>			۷٦,٦١٧			11,701			300,040	_	000,200			
	Subtotal, future:	\$	609,343		\$	398,283	-							
	past and future:	\$	619,218		\$	408,158	-							
		Ť	,= . 0	-	~	,	=							

Sources and Notes:

[1] See Schedule 12. Note: We have not apportioned the contributions to reflect coverage for the decedent's spouse and child only.

<sup>&</sup>lt;sup>[2]</sup> Discounted to present value using a discount rate of 1.91% based on the current yield on long term treasury bonds.

<sup>[3]</sup> Decedent's worklife expectancy ends.

<sup>[4]</sup> Assuming retirement at age 67.

Lee v. The Moody Bible Institute of Chicago But-For Employer Contributions to Fringe Benefits Scenario 2 - Based on Earnings with a Bachelor's Degree

	Annual Employer Contributions						
Period Beginning		Fringe enefits <sup>[1]</sup>					
1-Jul-20	\$	7,342					

Based on the Bureau of Labor Statistics study, Employer Costs for Employee Compensation, as of June 2020 the employer cost for health and disability benefits was \$3.53 per hour for fulltime employees in the private sector.

Cumulativa Tatala

### Lee v. The Moody Bible Institute of Chicago Loss of Support from Employer Contributions to Retirement and Savings Scenario 2 - Based on Earnings with a Bachelor's Degree

								•	Cumulative Totals				
									resent				resent
									alue of				alue of
	Decedent's					L	oss of	L	oss of	L	oss of	L	oss of
	Age at		oss of		edent's		oort from		oort from		oort from		port from
Period	Beginning	En	nployer		rsonal		nployer	En	nployer	En	nployer	Er	nployer
Beginning	of Period	Cont	ributions [1]	Cons	sumption [2]	Cont	ributions [3]	Cont	ributions [4]	Cont	ributions	Con	tributions
13-Jul-18	24.6	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-
1-Jan-19	25.1		-		-		-		-		-		-
1-Jan-20	26.1		-		-		-		-		-		-
1-Jul-20	26.6		1,556		358		1,198		1,198		1,198	_	1,198
1-Jan-21	27.1		2,624		604		2,020		2,020		3,218		3,218
	Subtotal, past:	\$	4,180	\$	962	\$	3,218	\$	3,218				
		_		_		_							
25-Oct-21	27.9	\$	601	\$	138	\$	463	\$	462	\$	463	\$	462
1-Jan-22	28.1		3,332		766		2,566		2,532		3,029		2,994
1-Jan-23	29.1		3,444		792		2,652		2,568		5,681		5,562
1-Jan-24	30.1		3,559		819		2,740		2,604		8,421		8,166
1-Jan-25	31.1		3,677		846		2,831		2,640		11,252		10,806
1-Jan-26	32.1		3,800		874		2,926		2,677		14,178		13,483
1-Jan-27	33.1		3,927		903		3,024		2,715		17,202		16,198
1-Jan-28	34.1		3,625		834		2,791		2,463		19,993		18,661
22-Nov-28	35.0		633		146		487		429		20,480		19,090
1-Jan-29	35.1		5,969		1,373		4,596		3,973		25,076		23,063
1-Jan-30	36.1		6,169		1,419		4,750		4,029		29,826		27,092
1-Jan-31	37.1		6,375		1,466		4,909		4,086		34,735		31,178
1-Jan-32	38.1		6,588		1,515		5,073		4,143		39,808		35,321
1-Jan-33	39.1		6,808		1,566		5,242		4,201		45,050		39,522
1-Jan-34	40.1		7,035		1,618		5,417		4,260		50,467		43,782
1-Jan-35	41.1		7,270		1,672		5,598		4,320		56,065		48,102
1-Jan-36	42.1		7,513		1,728		5,785		4,380		61,850		52,482
1-Jan-37	43.1		7,764		1,786		5,978		4,442		67,828		56,924
1-Jan-38	44.1		7,144		1,643		5,501		4,018		73,329		60,942
22-Nov-38	45.0		819		188		631		460		73,960		61,402
1-Jan-39	45.1		7,723		1,776		5,947		4,255		79,907		65,657
1-Jan-40	46.1		7,981		1,836		6,145		4,314		86,052		69,971
1-Jan-41	47.1		949		218		731		512		86,783		70,483
12-Feb-41	[5] 47.2		7,298		1,679		5,619		3,871		92,402		74,354
1-Jan-42	48.1		8,523		2,642		5,881		3,975		98,283		78,329
1-Jan-43	49.1		8,807		2,730		6,077		4,031		104,360		82,360
1-Jan-44	50.1		9,101		2,821		6,280		4,087		110,640		86,447
1-Jan-45	51.1		9,405		2,916		6,489		4,144		117,129		90,591
1-Jan-46	52.1		9,720		3,013		6,707		4,203		123,836		94,794
1-Jan-47	53.1		10,044		3,114		6,930		4,261		130,766		99,055
1-Jan-48	54.1		9,271		2,874		6,397		3,867		137,163		102,922
22-Nov-48	55.0		952		295		657		396		137,820		103,318
1-Jan-49	55.1		8,975		2,782		6,193		3,667		144,013		106,985
1-Jan-50	56.1		9,275		2,875		6,400		3,718		150,413		110,703
1-Jan-51	57.1		9,585		2,971		6,614		3,771		157,027		114,474
1-Jan-52	58.1		9,905		3,071		6,834		3,823		163,861		118,297
1-Jan-53	59.1		10,236		3,173		7,063		3,823		170,924		122,174
1-Jan-54	60.1		10,230		3,173		7,003		3,932		178,223		126,174
1-Jan-54 1-Jan-55	61.1				3,389								
	62.1		10,931 11,296				7,542 7,794		3,986		185,765		130,092
1-Jan-56 1-Jan-57					3,502				4,042 1 /81		193,559		134,134
1-Jan-57 11-May-57	63.1		4,161 7,512		1,290		2,871		1,481		196,430		135,615
•			7,512		2,329		5,183 7,411		2,638		201,613		138,253
1-Jan-58	64.1		10,741		3,330		7,411		3,708		209,024		141,961
22-Nov-58	65.0 65.1		1,249		387		862 9 139		430		209,886		142,391
1-Jan-59	65.1		11,779		3,651		8,128		3,983		218,014	<b>-</b>	146,374
1-Jan-60 22-Nov-60	66.1		10,872		3,370		7,502		3,614	<u> </u>	225,516	<u> </u>	149,988
		•	242.024	•	07 405	•	225 540	•	140.000				
	Subtotal, future:	<u>\$</u>	312,921	<u>\$</u>	87,405 88,367	<u>\$</u>	225,516 228,734	\$	149,988				
iotal,	past and future:	φ	317,101	Ψ	00,307	Ψ	220,134	Ψ	153,206				

<sup>[1]</sup> See Schedules 9 and 14.

 $<sup>^{[2]}</sup>$  Based on a personal consumption rate of 23.0% when there is one child in the home (to age 22), and 31.0% thereafter.

 $<sup>^{\</sup>left[3\right]}$  Loss of support equals loss of earnings less personal consumption of the decedent.

<sup>[4]</sup> Discounted to present value using a discount rate of 1.91% based on the current yield on long term treasury bonds.

<sup>[5]</sup> Daughter AL reaches age 22.

<sup>[6]</sup> Decedent's worklife expectancy ends.

<sup>[7]</sup> Assuming retirement at age 67.

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Schedule 14

Lee v. The Moody Bible Institute of Chicago But-For Employer Contributions to Pension Savings Plan Scenario 2 - Based on Earnings with a Bachelor's Degree

	Employer Contributions to
Period Beginning	Retirement and Savings [1]
1-Jul-20	3.80%

<sup>&</sup>lt;sup>[1]</sup> Based on the Bureau of Labor Statistics study, Employer Costs for Employee Compensation, as of June 2020 the employer cost for retirement and savings was 3.8% oof earnings for fulltime employees in the private sector.

### Lee v. The Moody Bible Institute of Chicago Loss of Household Services, Assuming Retirement at Age 67

										Cumulative Totals			
			_						Present				Present
	Decedent's Age at	Household		ring For/ lelping			oss of		Value of Loss of		oss of		/alue of ∟oss of
Period	Beginning	Activities and		usehold			usehold		Household		ousehold		ousehold
Beginning	of Period	Purchasing	***	embers	[1]		ervices	[2]	Services [3]		ervices		ervices
13-Jul-18 1-Jan-19	24.6 25.1	\$ 3,615 917	\$	85 917		\$	1,893 1,376		\$ 1,893 1,376	\$	1,893 3,269	\$	1,893 3,269
12-Feb-19 [4]		7,658		5,375			10,480		10,480		13,749		13,749
1-Jan-20	26.1	8,991		6,311			12,305		12,305		26,054		26,054
1-Jan-21	27.1	7,599		5,333			10,399		10,399		36,453		36,453
	Subtotal, past:	\$ 28,780	\$	18,021		\$	36,453		\$ 36,453			_	
05.0-1.04	07.0	\$ 1,739	\$	4.004		\$	0.000		¢ 0.070	•	0.000	•	0.070
25-Oct-21 1-Jan-22	27.9 28.1	\$ 1,739 9,699	ф	1,221 6,807		Ф	2,380 13,273		\$ 2,376 13,098	\$	2,380 15,653	\$	2,376 15,474
1-Jan-23	29.1	10,073		7,070			13,785		13,349		29,438		28,823
1-Jan-24	30.1	10,462		7,343			14,318		13,605		43,756		42,428
1-Jan-25	31.1	1,250		878			1,711		1,623		45,467		44,051
12-Feb-25 [5]	31.2	8,705		3,139			8,942		8,337		54,409		52,388
1-Jan-26	32.1	10,216		3,684			10,495		9,602		64,904		61,990
1-Jan-27	33.1	10,611		3,826			10,900		9,786		75,804		71,776
1-Jan-28	34.1	11,020		3,974			11,321		9,973		87,125		81,749
1-Jan-29	35.1	11,446		4,127			11,758		10,164		98,883		91,913
1-Jan-30	36.1	11,887		4,287			12,212		10,359		111,095		102,272
1-Jan-31	37.1	12,346		4,452			12,683		10,556		123,778		112,828
1-Jan-32	38.1	12,823		4,624			13,173		10,759		136,951		123,587
1-Jan-33	39.1 40.1	13,318		4,803			13,682		10,965		150,633		134,552
1-Jan-34 1-Jan-35	40.1	13,832 14,366		4,988 5,180			14,209 14,757		11,174 11,387		164,842 179,599		145,726 157,113
1-Jan-36	42.1	14,920		5,380			15,327		11,606		194,926		168,719
1-Jan-37	43.1	1,783		643			1,832		1,385		196,758		170,104
12-Feb-37 <sup>[6]</sup>		13,951		329			7,305		5,428		204,063		175,532
1-Jan-38	44.1	16,374		386			8,573		6,250		212,636		181,782
1-Jan-39	45.1	17,006		401			8,904		6,370		221,540		188,152
1-Jan-40	46.1	17,662		417			9,248		6,492		230,788		194,644
1-Jan-41	47.1	18,344		433			9,605		6,616		240,393		201,260
1-Jan-42	48.1	19,052		450			9,976		6,743		250,369		208,003
1-Jan-43	49.1	19,788		467			10,361		6,872		260,730		214,875
1-Jan-44	50.1	20,551		485			10,761		7,004		271,491		221,879
1-Jan-45	51.1	21,345		504			11,177		7,138		282,668		229,017
1-Jan-46	52.1	22,169		523			11,608		7,274		294,276		236,291
1-Jan-47	53.1	23,024		543			12,055		7,413		306,331		243,704
1-Jan-48	54.1	23,913		564			12,521		7,555		318,852		251,259
1-Jan-49	55.1	24,836		586			13,004		7,700		331,856		258,959
1-Jan-50	56.1	25,795		609			13,507		7,848		345,363		266,807
1-Jan-51 1-Jan-52	57.1 58.1	26,791 27,825		632 657			14,028		7,998		359,391 373,961		274,805
1-Jan-52 1-Jan-53	59.1	28,899		682			14,570 15,132		8,151 8,307		389,093		282,956 291,263
1-Jan-54	60.1	30,014		708			15,715		8,465		404,808		299,728
1-Jan-55	61.1	31,173		736			16,323		8,628		421,131		308,356
1-Jan-56	62.1	32,376		764			16,952		8,792		438,083		317,148
1-Jan-57	63.1	33,626		793			17,606		8,960		455,689		326,108
1-Jan-58	64.1	34,924		824			18,286		9,132		473,975		335,240
1-Jan-59	65.1	36,272		856			18,992		9,307		492,967		344,547
1-Jan-60	66.1	33,647		794			17,618		8,488		510,585		353,035
22-Nov-60 [7]	67.0	6,417		268			3,477		1,672		514,062		354,707
1-Jan-61	67.1	60,818		2,540			32,949		15,547		547,011		370,254
1-Jan-62	68.1	63,166		2,638			34,221		15,844		581,232		386,098
1-Jan-63	69.1	65,604		2,740			35,542		16,147		616,774		402,245
1-Jan-64	70.1	68,136		2,846			36,914		16,456		653,688		418,701
1-Jan-65	71.1	70,766		2,956			38,339		16,771		692,027		435,472
1-Jan-66	72.1	73,498		3,070			39,819		17,092		731,846		452,564
1-Jan-67	73.1	76,335		3,188			41,356		17,419		773,202		469,983
1-Jan-68	74.1	79,282		3,311			42,952		17,752		816,154		487,735
1-Jan-69	75.1	82,342		3,439			44,610		18,092		860,764		505,827
1-Jan-70	76.1	85,520		3,572			46,332		18,438	_	907,096	_	524,265
1-Jan-71	77.1	52,360		2,187			28,367		11,162	Щ	935,463	Щ	535,427
4-Aug-71 <sup>[8]</sup>	1 77.7 ubtotal, future:	\$ 1,564,097	\$	123,324		\$	935,463		\$ 535,427				
	ast and future:	\$ 1,592,877	- \$	141,345		\$	971,916		\$ 571,880				
·, P		. ,,	· <u> </u>	,	,	<u> </u>	,,,,,	- :	,				

## Sources and Notes: [1] See Schedule 16.

<sup>&</sup>lt;sup>[2]</sup> Loss of household services equals the value of household activities and purchasing apportioned at 50% to account for the decedent's but-for consumption (50%) in a two person household, and at 67% to account for the decedent's but-for consumption (33%) in a three person household. In addition, we have included 100% of the value of caring for and helping other family members.

<sup>[3]</sup> Discounted to present value using a discount rate of 1.91% based on the current yield on long term treasury bonds.

<sup>[4]</sup> Daughter AL is born.

<sup>[5]</sup> Daughter AL reaches age 6.

<sup>[6]</sup> Daughter AL reaches age 18.

<sup>[7]</sup> Assuming retirement at age 67.

### Lee v. The Moody Bible Institute of Chicago Annual Dollar Value of Household Services of Males, 2018

Hours Per Day in Household Work [1]

		Employe	d		Not Employed			
	Age	of Younge	st Child	Age	of Younges	st Child		
	0 to 6	6 to 18	18 or none	0 to 6	6 to 18	18 or none		
Household Activities								
Housework	0.28	0.24	0.20	[2]	0.39	0.27		
Food preparation and cleanup	0.40	0.33	0.33	0.63	0.50	0.42		
Lawn and garden care	0.18	0.20	0.23	[2]	[2]	0.38		
Household management	0.10	0.10	0.10	[2]	0.08	0.19		
Other	0.31	0.33	0.36	1.20	0.86	0.58		
	1.27	1.20	1.22	1.83	1.83	1.84		
Purchasing Goods and Services								
Consumer goods	0.32	0.24	0.22	[2]	0.20	0.32		
Professional and personal care services	0.03	0.03	0.04	[2]	[2]	0.22		
Other	0.28	0.25	0.27	[2]	0.26	0.34		
	0.63	0.52	0.53	0.66	0.46	0.88		
Total, Household Activities and Purchasing	1.90	1.72	1.75	2.49	2.29	2.72		
Caring For and Helping Household Members								
Household children	1.14	0.43	0.00	1.48	0.39	0.00		
Other members	0.15	0.17	0.04	0.18	0.20	0.11		
Total, Caring For and Helping Household Members	1.29	0.60	0.04	1.66	0.59	0.11		
Grand Total, Hours Per Day in Household Work	3.19	2.32	1.79	4.15	2.88	2.83		
Annual Dollar Value as of 2018								
Household Activities and Purchasing [3]	\$8,329	\$7,540	\$7,671	\$10,915	\$10,039	\$11,924		
Caring for and Helping Household Members [4]	\$5,846	\$2,719	\$181	\$7,522	\$2,674	\$498		
- · · · -	\$14,175	\$10,259	\$7,852	\$18,437	\$12,713	\$12,422		

<sup>[1]</sup> Based on the American Time Use Survey, 2018, Bureau of Labor Statistics, dated June 19, 2019. See Tables 8B and 8C.

<sup>[2]</sup> Insufficient data.

<sup>[3]</sup> Based on \$12.01 per hour. See Schedule 17.

<sup>[4]</sup> Based on \$12.42 per hour. See Schedule 17.

### Lee v. The Moody Bible Institute of Chicago Median Wage Rates for Household Services

	 2018	[1]
Food Preparation and Serving Related Occupations Cooks, short order Food preparation Dishwashers	\$ <b>11.85</b> 12.82 12.36 11.92	
Maids and Housekeeping Cleaners	\$ 12.17	
Childcare Workers Personal Care Aids	\$ 12.20 12.63	_
	\$ 12.42	
Hourly Wage: Household Activities and Purchasing	\$ 12.01	
Hourly Wage: Caring For and Helping Household Members	\$ 12.42	

Obtained from the 2018 Occupational Employment and Wage Estimates, published by the Washington State Employment Security Department, Workforce Information and Technology Services (WITS) Division. Data for the Spokane-Spokane Valley metropolitan area.